

FILED

FEB 14 2017

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY [Signature] DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

V.

CLEMENTINE T. RAY,

Defendant

\* CRIMINAL NO. **W17CR057**  
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INDICTMENT

[VIO: 18 U.S.C. 1343 – Wire Fraud]

THE GRAND JURY CHARGES:

I. INTRODUCTION

1. At all times relevant to this Indictment, Defendant, **CLEMENTINE T. RAY**, was the President of the Government Employees Local 2109, located in Temple, Texas.

2. Local 2109 currently represents approximately 1,200 members primarily consisting of members who work at the Veterans Affairs Hospital in Temple, Texas. Members of Local 2109 also consist of workers at clinics in Cedar Park, Brownwood, Fort Hood, Waco, and Austin, Texas.

II. THE SCHEME TO DEFRAUD

3. Beginning at least as early as January, 2011, and continuing to in or around September, 2014, the exact dates unknown to the Grand Jury, in the Western District of Texas and elsewhere, the Defendant,

**CLEMENTINE T. RAY,**

knowingly devised, participated in, and executed a scheme to defraud Local 2109 and to obtain money and property from Local 2109, and the members of Local 2109, by means of false and fraudulent pretenses, negotiations, promises, and the concealment of material facts.

4. In carrying out the scheme, the Defendant stole and embezzled money from Local 2109. In addition, the Defendant allowed false accounting statements to be made covering up the fact that she had embezzled Local 2109 funds.

5. Defendant RAY engaged in the following, among other fraudulently deceptive acts, practices, and devices, for the purpose of carrying out the scheme to defraud:

- a. The Defendant obtained a debit card on Local 2109's bank account;
- b. The Defendant used Local 2109's debit card to charge personal items, such as meals, gas, auto parts for her car, and other unauthorized charges;
- c. The Defendant covered up the embezzlement by claiming all her charges and expenses were for official union business;
- d. On or about November 17, 2012, the Defendant used the debit card belonging to Local 2109 to charge \$100.41 at O'Reilly Auto Parts in Cameron, Texas;
- e. On or about February 18, 2014, the Defendant used the debit card belonging to Local 2109 to charge \$74.50 to TLF Flowersshopping.com.

**COUNT ONE**

6. On or about August 22, 2013, in the Western District of Texas and elsewhere, the Defendant,

**CLEMENTINE T. RAY,**

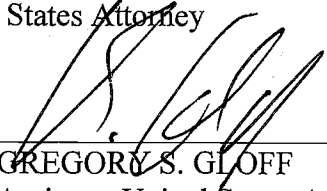
for the purpose of executing the scheme and artifice, and attempt to do so, transmitted and caused to be transmitted, by means of wire and radio communications, in interstate and foreign commerce, the following writings, signs, signals, pictures, and sounds, specifically, the Defendant, using the Local 2109 bank card, conducted a transaction for \$189 at the Gateway Clipper in Pittsburgh, Pennsylvania from the Local 2109 in Temple, Texas, in violation of Title 18, United States Code, Section 1343.

A TRUE BILL:

SEALED DOCUMENT PURSUANT  
TO E-GOVERNMENT ACT OF 2002.

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FOREPERSON

RICHARD L. DURBIN, JR.  
United States Attorney

  
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By: GREGORY S. GLOFF  
Assistant United States Attorney